

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

JONATHAN RAMON GONZALEZ-
PEREZ,
Defendant.

CRIMINAL NO. 16-273 (PAD)
17-345 (PAD)

MOTION TO RESTRICT

TO THE HONORABLE COURT:

COMES NOW the United States of America, by and through the undersigned attorneys, and very respectfully states and prays:

1. On June 13, 2025, the United States filed a motion that is self-explanatory related to the above captioned case (the “Motion”).

2. In compliance with the requirements of this Court’s Standing Order No. 9 dated January 30, 2013, the United States respectfully requests that the Motion be accepted by the Court for filing with the following level of restriction: *Selected Parties*, to be viewed only by the Court, the Government and defendant Jonathan Ramon Gonzalez-Perez.

3. The United States is filing the Motion with the requested level of restriction because the level of restriction requested is necessary to protect the confidentiality of the matters in the instant case. The protection of the information detailed in the Motion outweighs the presumption of public access.

WHEREFORE, the United States respectfully prays the Court accept and file the Motion under the requested restriction level, and that an ORDER is issued directing the Motion to remain under such restriction level until further order by the Court.

RESPECTFULLY SUBMITTED,

In San Juan, Puerto Rico, on this 13th day of June, 2025.

I HEREBY CERTIFY that on this date, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all attorneys of record.

W. STEPHEN MULDROW
UNITED STATES ATTORNEY

s/Joseph Russell
Joseph Russell
Assistant United States Attorney
Gang Section
Government Attorney # G03413
350 Chardon Avenue, Suite 1201
Hato Rey, Puerto Rico, 00918
Tel: 787-766-5656 Fax: 787-771-4050
Email: joseph.russell2@usdoj.gov